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UBER TECHNOLOGIES, INC.  
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL PORTIONS OF  
THEIR PRECIS LETTER  
REQUESTING PERMISSION TO  
FILE MOTION FOR SUMMARY  
JUDGMENT**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal portions of their Precis Letter Requesting Permission to File Motion for Summary Judgment. Specifically, Defendants request an order granting leave to file under seal the confidential portions of the following documents:

Document	Portions to Be Filed Under Seal	Designating Party
Precis Letter Requesting Permission to File Motion for Summary Judgment (“Precis”)	Highlighted Portions	Defendants (blue) Plaintiff (green)
Exhibit 2	Highlighted Portions	Defendants (blue) Plaintiff (green)
Exhibit 3	Entirety	Defendants
Exhibits 4-7	Entirety	Plaintiff

The blue-highlighted portions of the Precis, the blue-highlighted portions of Exhibit 2, and the entirety of Exhibit 3 contain highly confidential information regarding the technical details of Uber’s LiDAR systems, including a detailed schematic showing how one element of the system functions. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. Disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical components of Uber’s LiDAR sensors, such that Uber’s competitive standing could be significantly harmed. (Declaration of Michelle Yang in Support of Defendants’ Administrative Motion to File Documents Under Seal (“Yang Decl.”) ¶ 3.)

The green-highlighted portions of the Precis, the green-highlighted portions of Exhibit 2, and the entireties of Exhibits 4-7 contain information that has been designated “Highly Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this

1 case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in  
2 accordance with Paragraph 14.4 of the Protective Order. (Yang Decl. ¶ 4.)

3 Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the  
4 documents at issue, with accompanying chamber copies.

5 Defendants served Waymo with this Administrative Motion to File Documents Under  
6 Seal on August 15, 2017.

7 For the foregoing reasons, Defendants request that the Court enter the accompanying  
8 Proposed Order granting Defendants' Administrative Motion to File Documents Under Seal and  
9 designate the service copies of these documents as "HIGHLY CONFIDENTIAL –  
10 ATTORNEYS' EYES ONLY."

11  
12 Dated: August 15, 2017

MORRISON & FOERSTER LLP

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14 By: /s/Arturo J. González  
ARTURO J. GONZÁLEZ

15 Attorneys for Defendants  
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